

Message

From: Shalev, Omer [Shalev.Omer@epa.gov]
Sent: 8/3/2017 4:54:02 PM
To: steven.chang@doh.hawaii.gov
CC: roxanne.kwan@doh.hawaii.gov; Linder, Steven [Linder.Steven@epa.gov]; Pallarino, Bob [Pallarino.Bob@epa.gov]
Subject: RE: Revised Destructive Testing Condition for concurrence- RE: Revised Item 1
Attachments: Red Hill SOW 5.3.2.- Conditional Approval Revision_04AUG17.docx

Hi DOH, I have drafted this letter to reflect the revised condition from our previous conditional approval letter. Please review and let us know if you have comments. We would like to get this out on Monday of next week.

Thanks,

Omer Shalev
Environmental Engineer
Land Division (LND 4-2)
Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105
(415) 972-3538

From: Shalev, Omer
Sent: Tuesday, August 01, 2017 10:11 AM
To: steven.chang@doh.hawaii.gov
Cc: roxanne.kwan@doh.hawaii.gov; Linder, Steven <Linder.Steven@epa.gov>; Pallarino, Bob <Pallarino.Bob@epa.gov>
Subject: FW: Revised Destructive Testing Condition for concurrence- RE: Revised Item 1

Hi Steve as you may recall, we proposed changing the Destructive Testing condition 1 (pasted below)

~~REVISIONS:~~

1. The Navy and DLA shall seek concurrence from the Regulatory Agencies on the specific plan for NDE of each tank that will be part of the NDE verification described in the AOC 5.3.2 SOW. This plan should include the probability of detection ("POD") data for the tools to be used for the NDE.
2. The process for coupon selection shall jointly involve the Regulatory Agencies and SMFCs. ~~The Regulatory Agencies and external subject matter experts shall be given an~~

I have worked with Phil Myers, and we would like to change this condition to read:

The Navy and DLA shall seek concurrence from the Regulatory Agencies on the specific plan for NDE of each tank that will be part of the NDE verification described in the AOC 5.3.2 SOW. This plan should include validating the NDE measures to be used for each damage mechanism of concern (i.e. cracks, pits, general thinning, etc.). Validation in this context means establishing that the contractor performing the work for the Navy will describe and explain the basis for equipment and techniques used. Any claims of achievable performance should be supported with past performance evidence or references as well as its expected performance criteria. The contractor performing the work shall also include professional codes, standards and/or procedures that are employed, and describe any equipment calibrations and/or testing performed to confirm claimed performance, such as probabilities of detection or past performance

demonstration projects, if available. The contractor shall specify personnel qualifications, and any conditions employed to control and audit the specific individual's performance while the work is being performed.

Let me know if you agree with the new wording or have any concerns.

We want to go over this with Mark and John during our call.

Thanks,

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From: Philip Myers [<mailto:phil@pemyconsulting.com>]
Sent: Monday, July 31, 2017 8:19 PM
To: Shalev, Omer <Shalev.Omer@epa.gov>; Linder, Steven <Linder.Steven@epa.gov>
Cc: Pallarino, Bob <Pallarino.Bob@epa.gov>
Subject: RE: Revised Destructive Testing Condition for concurrence- RE: Revised Item 1 from Conf Call 07/19/17 on DE and NDE

I am in agreement. I have a few suggested editorial that are highlighted if you want to take the suggestions. Thanks.

Philip Myers
PEMY Consulting
925-302-6707
phil@PEMYconsulting.com

From: Shalev, Omer [<mailto:Shalev.Omer@epa.gov>]
Sent: Monday, July 31, 2017 4:22 PM
To: Philip Myers <phil@pemyconsulting.com>; Linder, Steven <Linder.Steven@epa.gov>
Cc: Pallarino, Bob <Pallarino.Bob@epa.gov>
Subject: RE: Revised Destructive Testing Condition for concurrence- RE: Revised Item 1 from Conf Call 07/19/17 on DE and NDE

Phil, did you have any concerns with the language I drafted below? Let us know, thanks.

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From: Shalev, Omer
Sent: Tuesday, July 25, 2017 11:24 AM
To: 'Philip Myers' <phil@pemyconsulting.com>; Linder, Steven <Linder.Steven@epa.gov>
Cc: Pallarino, Bob <Pallarino.Bob@epa.gov>

Subject: Revised Destructive Testing Condition for concurrence- RE: Revised Item 1 from Conf Call 07/19/17 on DE and NDE

All,

I revised Phil's language so that the condition would reads follows:

The Navy and DLA shall see concurrence from the Regulatory Agencies on the specific plan for NDE of each tank that will be part of the NDE verification described in the AOC 5.3.2 SOW. This plan should include validating the NDE measures to be used for each damage mechanism of concern (i.e. cracks, pits, general thinning, etc.). Validation in this context means establishing that the contractor performing the work for the Navy will describe and explain the basis for equipment and techniques used. Any claims of achievable performance should be supported with past performance evidence or references as well as its expected performance criteria. The contractor performing the work shall also include professional codes, standards and/or procedures that are employed, and describe any equipment calibrations and/or testing performed to confirm achievable claimed performance, such as probabilities of detection or past performance demonstration projects, if available. The contractor shall specify personnel qualifications, and any conditions employed to control and audit the specific individual's performance while the work is being performed.

Phil and Steve, please let me know if you think this appropriate or have any comments.

I don't think the Navy or contractor should be explaining why or why not a particular NDE technique employed meets or exceeds industry best practice. The plan more simply needs to tell use what they are using for NDE and why. I also don't want the performance claims to be validated to the satisfaction of all stakeholders, that is too open ended and we could be arguing needlessly with an outside stakeholder for months over a performance claim.

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From: Philip Myers [<mailto:phil@pemyconsulting.com>]

Sent: Wednesday, July 19, 2017 3:06 PM

To: steven.chang@doh.hawaii.gov; Linder, Steven <Linder.Steven@epa.gov>; Pallarino, Bob <Pallarino.Bob@epa.gov>; Shalev, Omer <Shalev.Omer@epa.gov>

Subject: Revised Item 1 from Conf Call 07/19/17 on DE and NDE

It's a little long winded but here is my attempt at clarifying item 1.

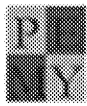
The clip below from our telecon today with the navy can be modified and improved as discussed. Here is my recommendation for it:

"The Navy and DLA shall see concurrence from the Regulatory Agencies on the specific plan for NDE of each tank that will be part of the NDE verification described in the AOC 5.3.2 SOW. This plan should include validating the NDE techniques to be used for each damage mechanism of concern (i.e. cracks, pits, general thinning, etc.). Validation in this context means establishing that the contractor performing the work for the Navy will use appropriate equipment, techniques, and personnel to ensure that the work is done in accordance with best industry practices but also exceeds these practices by providing all of their bases for their claimed performance characteristics and performance levels.

Validation shall include contractor statements about what codes and standards they are using, how they control the specific individual's performance while the work is being done, and how they are exceeding today's best practices for NDE/DE. It is required that to accomplish this, any work done in the past by candidate contractors shall be provided by them. This information includes but is not limited to calibrations and testing done to establish probabilities of detection, performance demonstration projects they have conducted internally or for other companies and references for this work. Such performance claims shall be validated by the contractor to the satisfaction of all stakeholders.

INITIALS:

1. The Navy and DLA shall seek concurrence from the Regulatory Agencies on the specific plan for NDE of each tank that will be part of the NDE verification described in the AOC 5.3.2 SOW. This plan should include the probability of detection ("POD") data for the tools to be used for the NDE.
2. The process for coupon selection shall jointly involve the Regulatory Agencies and SMEs. The Regulatory Agencies and external subject matter experts shall be given an



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